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24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO FILE
AMENDED COMPLAINT AND FOR
DEFENDANTS TO FILE REPLY TO
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ MOTION FOR RULE 11
SANCTIONS**

(SECOND REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until May 11, 2022, to file an Amended Complaint in compliance with the Court’s Order filed on March 30, 2022. ECF No. 178. Additionally, the parties agree to permit Defendants, to and until May 31, 2022, to file a reply to Plaintiff’s opposition (ECF No. 183) to Plaintiff’s motion for FRCP 11 sanctions (ECF No. 174).

Presently, Plaintiff is expected to file an Amended Complaint on or before April 29, 2022 and Defendants are expected to file a reply brief on May 20, 2022. *See* ECF No. 187. This is the parties second request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties rely upon the following:

1. Counsel for Plaintiff have been diligently working on drafting and finalizing an Amended Complaint. However, part of that process requires verification and investigation of certain facts. To that end, counsel for Plaintiff need to speak with certain witnesses and coordinate respective schedules in order to do so. One of those witnesses has been, until recently, unavailable due to other work commitments. The additional time requested herein will permit counsel for Plaintiff to speak with appropriate witnesses and finalize the Amended Complaint while at the same time meet other case commitments in unrelated cases.

2. Counsel for both parties respectfully request the Court approve this Stipulation and permit the following:

- a. Plaintiff shall file an Amended Complaint on or before May 11, 2022;
- b. Defendants shall file a reply to Plaintiff’s opposition to the FRCP 11 motion on or before May 31, 2022.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda

4 _____
Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
6 *Counsel for all named Defendants*

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
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*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

7 Dated: April 27, 2022

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9 Dated: April 27, 2022

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11 **IT IS SO ORDERED:**

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14 **UNITED STATES MAGISTRATE JUDGE**

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16 **DATED: April 27th, 2022**